

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	)	Case No. 17-22147-GLT
	)	
RONALD S. JONES,	)	Chapter 7
	)	
Debtor.	)	Adv. Pro. No. 19-02096-GLT
	)	
	)	Related Dkt Nos. 55, 58, 62, 68
ROBERT SHEARER, as Chapter 7 Trustee	)	
of the Estate of Ronald S. Jones,	)	Hearing: January 7, 2021 at 10:00 a.m.
	)	
Plaintiff/Movant,	)	
	)	
vs.	)	
	)	
RONALD S. JONES and GRACE	)	
BETANCOURT JONES,	)	
	)	
Defendants/Respondents.	)	

**RESPONSE OF CHAPTER 7 TRUSTEE TO ORDER TO SHOW CAUSE**

Plaintiff Robert Shearer, Chapter 7 Trustee of the Bankruptcy Estate of Ronald S. Jones, by his special counsel, hereby files his Response to the Order to Show Cause entered by this Court on December 18, 2020 as follows:

1. Pursuant to Order of this Court dated November 6, 2020 [Dkt. No. 55], mediation was ordered relating to the issues currently pending in this adversary proceeding. Subsequently, this Court entered a Mediation Referral Order [Dkt. No. 58] setting forth further details of the mediation.

2. Pursuant to this Court's direction, a mediation session was held on Monday, November 23, 2020 before Mediator Judith K. Fitzgerald.

3. As noted in the Mediator's Certificate of Completion of Mediation Conference [Dkt. No. 62] filed on November 24, 2020, during the mediation conference a settlement was

reached between the Trustee and Mr. and Mrs. Jones, but was not reached between Creditor Terri Patak and Mr. and Mrs. Jones.

4. Notwithstanding the settlement and intervening court filings relating to compensation for the Mediator, Mr. and Mrs. Jones to date have not taken the action required of them under the settlement.

5. Starting during the week prior to the Christmas break, representatives of Debtor Ronald Jones and Grace Jones communicated that they wanted to modify the settlement reached with the Mediator on November 23, 2020.

6. Although the Trustee has listened to the requests to modify made on behalf of Mr. and Mrs. Jones, to date no such modified settlement has been agreed upon by the parties. Moreover, it is doubtful that any type of modification to the settlement can be effectively reached in the short term.

7. Although Trustee Shearer (and Creditor Terri Patak) remain interested in effectuating the settlement reached on November 23, 2020, they do not wish to run afoul of this Court's mediation procedures and any timetable the Court may consider in renewing arguments on the pending Motions for Summary Judgment previously filed in this adversary proceeding.

WHEREFORE, for the foregoing reasons, Chapter 7 Trustee Robert Shearer hereby respectfully requests that this Court order enforcement of the settlement reached by the parties on November 23, 2020 or, in the alternative, reschedule argument on the pending Motions for Summary Judgment.

Respectfully submitted,

DICKIE, MCCAMEY & CHILCOTE, P.C.

By: /s/ Samuel R. Grego

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Date: January 4, 2021